# STATE OF ALASKA

# ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

### SEAN PARNELL, Governor

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June 25, 2012

Jeanette Pomrenke, Superintendent Being Land Bridge National Preserve P.O. Box 220 Nome, AK 99762

Dear Ms. Pomrenke:

The State of Alaska reviewed the Serpentine Hot Springs/Iyat Area Master Plan Newsletter #2. The State is supportive of this planning effort to consider potential improvements for the Serpentine Hot Springs and surrounding area in the Bering Land Bridge National Preserve. The following comments represent the consolidated views of the State's resource agencies.

## **Aviation Safety Improvements**

As acknowledged in the newsletter, runway safety improvements are a significant issue at Serpentine Hot Springs. The airstrip's length and side slope clearance is not compliant with FAA standards. In addition, infrequent maintenance has led to problems with aircraft landings and limited air taxi service to the area. We support considering all available options to improve safety and access to the area, including lengthening the runway, hardening the surface, and a local weather camera. We recommend the EA also indicate how the Service would fund any minor or major runway projects, including how maintenance of any improvements, web cams or a weather station would be managed and funded. The Alaska Department of Transportation and Public Facilities (ADOT&PF) supports such safety improvements and is willing to provide technical assistance.

#### **Ivat Area Wilderness Eligibility**

We support removing the Iyat Area from wilderness eligibility. In fulfillment of the Alaska National Interest Lands Conservation Act (ANILCA) Section 1317 requirement to conduct a one-time wilderness review to determine if additional lands not already designated by the Act were suitable for wilderness designation, the Service evaluated the Bering Land Bridge National Preserve in 1988 and the Iyat Area was not recommended for wilderness designation. National policy, which requires the Service to manage all eligible lands to preserve wilderness character regardless of whether they have been recommended as designated wilderness, ignores specific direction for Alaska under ANILCA and, as a result, unnecessarily constrains the Service in considering viable options to address management issues and fulfill one of the preserve's founding purposes "to provide outdoor recreation and environmental education, including public access for recreation at Serpentine Hot Springs" (ANILCA Section 201(2)). While historic use and structures are provided for under both the Wilderness Act and ANILCA,

revising the wilderness eligibility determination will allow the Service the needed flexibility to properly administer the area.

#### **Trail Markers**

Serpentine Hot Springs' remote location makes access difficult. Committing to expand and maintain the existing system of trail markers would improve access and public safety as well as provide for local hire opportunities. In addition, it may be possible to work with the ADOT&PF on another winter trail marking project. For additional information, please contact the Northern Region Planning Section at (907) 451-5151.

#### **Public Facilities**

We support including alternatives in the EA to construct an administrative/reservation cabin, a Tors Area shelter cabin, and maintain the bunkhouse on a first come first serve basis. In particular, allowing public use of the administrative cabin for a majority of the year would increase opportunities for visitors to experience the hot springs. The proposed Tors Area shelter cabin would also provide emergency shelter for people traveling to and from the Nome-Taylor Highway. We also support reestablishing the Arctic Hot Springs to improve the cultural resources, reduce a sense of crowding in the area, and allow multiple groups to use the hot springs at the same time. Lastly, when considering bathroom facility options, an important consideration in a remote sub-arctic climate is composting type toilets need to maintain a warm temperature to effectively compost waste.

#### **Stream Stabilization**

We request the Service contact the Alaska Department of Fish and Game, Fairbanks Regional Habitat Biologist, Bill Morris, to determine if stream stabilization and modification of Hot Springs Creek requires a fish habitat permit.

#### **Interpretive Improvements**

When considering proposed improvements to the interpretive program at the site, we recommend close collaboration with residents of Shishmaref and Nome as well as other villages in the area.

Thank you for this opportunity to comment. Please contact me at (907) 269-7529 if you have any questions.

Sincerely

Susan Magee

ANILCA Program Coordinator

cc: Zachary Babb, NPS Alaska Region